UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

AMERICAN CLOTHING EXPRESS, INC., D/B/A ALLURE BRIDALS AND JUSTIN

ALEXANDER, INC.,

Plaintiffs,

v.

CLOUDFLARE, INC. and DOES 1 - 200, inclusive,

Defendants.

Case No. 2:20-cy-02007-SHM-dky

MOTION FOR DEFAULT JUDGMENT AGAINST 94 WEBSITE DEFENDANTS

Plaintiffs American Clothing Express, Inc., d/b/a Allure Bridals and Justin Alexander, Inc.

(collectively, "Plaintiffs") respectfully move this Court, pursuant to Rule 55(b)(2) of the Federal

Rules of Civil Procedure, against the 94 Website Defendants so defined in Exhibit 1 to the

Declaration of Russell Bogart, Esq., and any such further relief as the Court deems just and proper.

In further support thereof, Plaintiffs rely on the Memorandum of Law filed contemporaneously

herewith, the Clerk's Entries of Default, the Declaration of Russell Bogart, Esq. and all

accompanying exhibits, and all prior papers and proceedings herein.

DATED: December 6, 2021

Respectfully submitted,

s/ Nicole D. Berkowitz

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1

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Attorneys for Plaintiffs-Counterdefendants American Clothing Express, Inc. d/b/a Allure Bridals and Justin Alexander, Inc.

CERTIFICATE OF CONSULTATION

I hereby certify that on December 1, 2021, counsel for Plaintiffs conferred by email with counsel for Cloudflare, Inc. regarding the relief sought herein. On December 6, 2021, counsel for Cloudflare, Inc. indicated that Defendant Cloudflare, Inc. would like an opportunity to review the filing before providing its position. Counsel for Plaintiffs was unable to confer with the 94 Website Defendants who are in default.

s/ Nicole D. BerkowitzNicole D. Berkowitz

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2021, a true and correct copy of the foregoing was filed via the Court's CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record.

s/ Nicole D. Berkowitz

Nicole D. Berkowitz